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) CC Docket 96-98

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In its comments, AT&T expresses its belief that interim thousands-block pooling measures, if deployed subject to certain conditions, could serve the public interest. In the comment cycle, Ameritech and others pointed out that such interim pooling deployments could conflict with and delay efforts to roll out pooling based upon a set of national requirements.<sup>4</sup> If the Commission does allow Wisconsin and other states to move forward with interim pooling arrangements, Ameritech strongly recommends that the Commission first require such states to make formal findings using the analysis procedure detailed in Attachment A of Ameritech's comments, and included here, that pooling could significantly delay exhaust of the particular NPA in which it will be implemented. The potential risk of adverse effects caused by such interim measures on permanent NPA relief and a national rollout of pooling is huge.<sup>5</sup> Before states are permitted to foster those risks, they should be obligated to show proof that they are warranted.

In its comments, the Pennsylvania Office of Consumer Advocate ("OCA") states its belief that a lack of uniform requirements for the reservation of telephone numbers is a substantial contributing factor to the pending exhaust of the NANP<sup>6</sup>. However, the OCA does not offer any evidence that reserved numbers have actually contributed to this

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<sup>4</sup> Comments of Ameritech, at 7; Comments of Bell Atlantic, at 2.

<sup>5</sup> For example, states may be incented to abandon proven NPA relief activities in the vain hope that pooling will "save" an NPA that is already in extreme jeopardy. This situation has already occurred in California, where the CPUC has withdrawn its previous approval of the implementation of overlay NPA 424 (which was already underway), even though there are only 29 NXXs remaining in area code 310 and over 70 requests for NXXs within the relief NPA. The CPUC has also ordered carriers to revert back to 7 digit dialing. In addition, interim pooling deployments may force certain carriers to engage in costly enhancements to their LNP architectures to add capacity that would otherwise be unneeded if the EDR capability inherent with national pooling were available.

pending exhaust. To the contrary, Ameritech is unaware of any study conducted anywhere that indicates that the volume of numbers held in reserve is excessive and/or a major factor in NPA exhaust. Ameritech has been actively participating in NANC's Numbering Resource Optimization Working Group activities on reserved numbers, and fully supports the establishment of national limits on both the quantity and intervals for such reservations. However, Ameritech is concerned that such unsupported claims could lead to the adoption of extreme limits, which would cause undue harm to end users with a continuing, legitimate need to reserve numbers. Ameritech believes that such action would be a "solution in search of a problem". Absent any supporting evidence that number reservations are a major cause to NPA exhaust, the Commission should exercise caution in setting limits on their use.

MCI WorldCom opposes all but one of items for which the PSCW seeks authority<sup>7</sup>. It is ironic that MCI asks the Commission to deny those items intended to force carriers to more efficiently manage the numbering resources already assigned to them and to justify requests for additional NANP resources, yet recommends that the Commission grant the one measure (i.e., UNP) which would allow carriers unlimited access to even more numbers. Ameritech and other parties have provided ample evidence in this proceeding and others that UNP is not readily deployable, is not a number conservation measure, can compromise efforts to deploy national pooling, and

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<sup>6</sup> Comments of Pennsylvania OCA, at Section B, paragraph 3.

<sup>7</sup> Comments of MCI WorldCom, at 3.

can hasten the exhaust of NANP resources<sup>8</sup>. It is encouraging that the Commission has acknowledged these very real problems with UNP and specifically rejected its use in the conditional authority recently granted to New York and Massachusetts.<sup>9</sup> Although supporters of this measure claim that UNP's impact will be minimal, they want no restrictions on its use<sup>10</sup>. As such, UNP presents a huge opportunity for carriers to preserve their own inventories of assignable numbers while raiding those of others. MCI's proposal to allow states to move forward with the deployment of UNP is merely an attempt to gain a foothold for a measure that would otherwise not pass federal scrutiny as a viable optimization alternative.

All commenters seem to agree on one point - continuing delays on the Commission's part to take decisive action on a consistent, nationwide plan for number optimization has caused undue hardship on the industry, the states and consumers<sup>11</sup>. The bandaid approach currently advocated by some states can no longer stop the bleeding. The Commission simply must address the issues itself, and do so quickly.

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<sup>8</sup> See, e.g., Ameritech Comments in CC Docket 99-200, at 47; Ameritech Reply Comments, at 16; Winstar Reply Comments in CC Docket 99-200, at 14; BellSouth Reply Comments in CC Docket 99-200, at 13.


<sup>9</sup> Order in CC Docket 96-98, In the Matter of New York State Department of Public Service Petition for Additional Delegated Authority to Implement Number Conservation Measures, at 36-7; Order in CC Docket 96-98, In the Matter of Massachusetts Department of Telecommunications and Energy's Petition for Waiver of Section 52.19 to Implement Various Area Code Conservation Methods in the 508, 617, 781, and 978 Area Codes, at 42-3.

<sup>10</sup> See MCI Reply Comments in CC Docket 99-200, at 20.

<sup>11</sup> See, e.g., Ameritech Comments at 2; USTA Comments at 2.

In addition, Attachment A to these Reply Comments is a corrected version of Attachment A to Ameritech's Comments in this proceeding, and replaces that earlier version in its entirety.

Respectfully submitted,

  
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## **ATTACHMENT A**

Ameritech believes that a careful analysis can be conducted of the potential benefits of thousands-block pooling in an NPA prior to any decision on how or if it should be deployed. The analysis can be conducted through a five-step process.

1. Determine the number of rate centers/districts within each NPA that would comprise the pool(s).
2. Ascertain the number of blocks within each (pooling) carrier's own inventory that could be eligible for donation to the pools.
3. Request and aggregate quarterly block forecasts, by rate center/district, from each carrier that could participate in pooling, and to compare those forecasts with the block resources available to determine when and how many additional NXX codes must be assigned to replenish the pools.
4. Determine the number of non-pooling carriers and their quarterly NXX code requirements.
5. Estimate the number of new carriers that will enter the market within those NPAs, taking into account that they will require at least one new NXX (for LRN assignment) and one additional thousands-block for each rate center/district served.

Since NPA exhaust is driven by the exhaust of assignable NXX codes, the aforementioned five step process would provide the needed NXX code consumption rate (NXX codes needed by non-pooling carriers + NXX codes needed to maintain the pools + NXXs needed for LRN assignment to new entrants), which can then be compared with the remaining unassigned NXX codes to estimate the NPA exhaust date.

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of Ameritech's Reply Comments has been served on all parties in this proceeding, via facsimile and U.S. mail on this 27th day of September 1999.

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